

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

BRADLEY S. FANNING,

Defendant.

Case No. 1:19-mj-244

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Officer Michael Medeiros, being duly sworn, state the following:

1. I entered on duty with the Security Protective Service ("SPS") of the Central Intelligence Agency ("CIA") in June 2017. I graduated from the Federal Law Enforcement Training Center in October 2017. Following my graduation, I received an additional eight weeks of CIA-specific training prior to being assigned as an officer at various CIA installations.

2. This affidavit is submitted in support of a criminal complaint charging BRADLEY S. FANNING with criminal trespass at CIA Headquarters in Mclean, Virginia, in violation of 32 C.F.R. § 1903.7, which prohibits entering or remaining on an Agency installation without proper authorization.

3. The facts and information contained in this affidavit are based upon my personal knowledge and observations during the course of this investigation, information conveyed to me by other individuals, including law enforcement officers, and my review of records, documents, and other physical evidence obtained during the investigation. This affidavit contains information

necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

4. On May 21, 2019, at approximately 2:00 p.m., CIA Police Officers initially encountered the Defendant at the Visitor Control Center (VCC) at CIA Headquarters in McLean, Virginia, within the Eastern District of Virginia. The Defendant arrived by taxi, and passed a sign that reads, in pertinent part:

“WARNING  
RESTRICTED  
U.S. GOVERNMENT  
INSTALLATION  
EMPLOYEES AND OFFICIAL VISITORS ONLY  
IT IS UNLAWFUL TO ENTER  
OR ATTEMPT TO ENTER  
THIS INSTALLATION WITHOUT  
PROPER AUTHORIZATION.”

5. Upon arrival, Officers asked the Defendant to state his business at CIA Headquarters, and he revealed that he was at the CIA for a meeting, but refused to identify who the meeting was with, or the purpose of the meeting. Officers then asked the Defendant for identification, and he provided a Georgia Driver’s License. Eventually, the Defendant disclosed that he was at CIA Headquarters to start his first day of work for the Agency. After a review of Agency records, Officers determined the Defendant was not an applicant or employee, and did not have legitimate business at the CIA, and gave him a verbal warning that he was trespassing. The Defendant then refused to leave, and I issued a written warning to the Defendant for trespassing

on an Agency installation in violation of 32 C.F.R. § 1903.7. The Defendant again stated that he would not leave, and declaimed, "I'm coming to work. Today's my first day. I'm not leaving." I then warned the Defendant that if he did not depart the premises, he would be arrested for trespassing. The Defendant persisted in his refusal to leave the premises, and I ordered him to exit the vehicle. The Defendant exited the vehicle as directed, and I arrested him for trespassing.

8. Except for this trespassing incident, the CIA has no current or prior official relationship with the Defendant.


9. Based on the foregoing, I submit there is probable cause to believe that on May 21, 2019, within the Eastern District of Virginia, BRADLEY S. FANNING did remain on an Agency installation without proper authorization, after being ordered to leave, in violation of 32 C.F.R. § 1903.7.



Officer Michael Medeiros  
Security Protective Service  
Central Intelligence Agency

Subscribed and sworn to before me  
This 21<sup>st</sup> day of May 2019.



                     /s/   
John F. Anderson  
~~United States Magistrate Judge~~  
Honorable John F. Anderson  
United States Magistrate Judge  
Alexandria, Virginia